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Albany, CA 94706
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Federal Communications Commission

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I am very concerned about the various proposals suggesting rather sweeping changes to the underlying structure of the amateur radio service. Whereas I can understand portions of the proposals suggesting certain consolidations I have trouble seeing the correlation between ITU requirement relaxations and this country's obligation to match in turn. Few countries, if any, have the per capita number of amateur radio operators of this country, consequently few would have the same complex issues relating to community versus amateur radio enthusiasts. We don't have an obligation to reduce our 'standards' if they meet or exceed those proposed by the ITU. We do, on the other hand, have an obligation to find the best possible balance between 'ease of entry', maintainability, and present and future service to the community.

There is an apparent trend for those in such a highly industrialized culture to become overly dependant on the sophisticated tools of that culture and as a consequence see increasingly less value on tools of less sophistication. The amateur radio service is, or at least should be, a genuine bridge between the simple and the complex. We need to allow for the inclusion of sophisticated technologies and tools if for no other reason than to attract a self-sustaining body of volunteers… as well as continue internal experimentation that has in its own right led to ever increasing capabilities to provide a genuine service to an ever more complex community. However, we must also strive to insure a base-level of competency in the amateur radio community so that there will remain a reasonable number of radio enthusiasts that are able to function when sophisticated tools and technologies are not available. When is the amateur service of greater service… when the communication infrastructure is working relatively normal or when it isn't? It is my contention that we must encourage and maintain both the least and most sophisticated communication skill sets. To this regard I believe it is important that beyond a basic entry level license class… that must by its nature provide privileges that are attractive but still severely limited. Probably the best way to do this is not necessarily to limit available modes but to limit total access and total capabilities (i.e. Small operating segments in each band allowing for all available modes but with a definite cap on power). And at the same time I believe that there must be at least two levels of license attainment beyond the entry level with a genuine benefit available to those who put forward the effort to prepare themselves for the final level and that these two license classes should require morse code proficiencies at no less than 5 wpm (although I believe the top class should be approximately 13 wpm to insure that there are a sufficient number of amateur operators who are available to function in this minimal technology communications mode.

Each day I see increasing signs of individuals who all too easily entered the amateur radio service and almost as quickly removed themselves. This is human nature to some extent so will always be a part of the process but it is a condition that is easily exacerbated by lowering the bar of admission. It does not hurt the Commission in any way to encourage a definite progressive path from entry to expert. And I dare say that simply having large numbers of licenses on record does, in it's self, little to insure that there will be a sizeable percentage of truly trained and self-disciplined radio/communications experts available in times of local, state or national need. On the other hand, it does, I suppose, insure slightly higher subscription rates for some publications and better sales of imported technologies in this country… which I personally believe are strong motivators behind certain parts of the recent proposals of changes to the amateur service. Perhaps I am neive but I believe that there are other ways to lure new members to this service and setting reasonably difficult entry standards only discourages those who do not see the value received from the privileges obtained.

In conclusion, if we must restructure certain aspects of the amateur radio service perhaps the road more difficult to travel isn't necessarily a bad one.

1. Entry license: Technician Class with a discrete mix of HF, VHF and UHF frequency privileges. No code test. Emphasis on safety, service to community, proper station operations, minimizing interference to others. All existing Novices rolled into license. Current technicians would have some definite frequency restrictions added and that is that.
2. Standard license: General Class with approximately 2/3 of the available frequency spectrum in HF, VHF, and UHF. Full power capabilities in their segments. Code proficiency of 5 wpm. Able to show technical proficiencies sufficient to assemble properly run amateur stations using all common communication modes and any additional safety concerns regarding their newly obtained privileges.
3. Expert license: Extra Class with full access to all available frequency spectrums and the ability to develop and experiment with new modes with restrictions only in bandwidth and power. Code proficiency of 10 wpm minimum. Technical proficiency in rf, analog, and digital circuitry theory and any additional safety concerns regarding their newly obtained privileges. Current Advanced Class licenses rolled into this class.

Regards,

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KG6TT, Extra Class Amateur Radio Licensee